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UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA

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SAN FRANCISCO DIVISION

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MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

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Plaintiffs,

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v.

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META PLATFORMS, INC., a Delaware
Corporation headquartered in California,

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Defendant.

Case No. 3:20-cv-08570-JD

**DECLARATION OF AMRISH
ACHARYA IN SUPPORT OF OMNIBUS
MOTION TO SEAL MATERIALS
SUBMITTED IN CONNECTION WITH
SUMMARY JUDGMENT AND *DAUBERT*
BRIEFING IN THE ADVERTISER CASE**

Judge: Hon. James Donato

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No. 3:20-cv-08570-JD

DECL. OF AMRISH ACHARYA ISO OMNIBUS
MOT. TO SEAL MATERIALS SUBMITTED IN
CONNECTION WITH SUMMARY JUDGMENT
AND *DAUBERT* BRIEFING

1.   I, Amrish Acharya, declare as follows:

2.   I am a Director of Finance at Meta Platforms, Inc. I have been employed by Meta since 2015 and have held my current title since 2021. Over the course of my employment at Meta, I have acquired personal knowledge of Meta's practices and procedures concerning the maintenance of the confidentiality of its strategic, business, financial, technical, and marketing information.

3.   I respectfully submit this declaration in support of the Omnibus Motion to Seal Materials Submitted in Connection with the Summary Judgment and *Daubert* Briefing in the Advertiser case ("Sealing Motion"), filed on March 14, 2025 in *Klein v. Meta Platforms, Inc.*, Case No. 3:20-cv-08570-JD (N.D. Cal.).

4.   The facts set forth in this declaration are true and correct to the best of my knowledge, information, and belief, and are based on my personal knowledge of Meta's policies and practices as they relate to the treatment of confidential information, materials that were provided to me and reviewed by me, or conversations with other knowledgeable employees of Meta. If called upon as a witness in this action, I could and would testify from my personal knowledge and knowledge acquired from sources with factual foundation.

5.   All the material for which Meta requests sealing is maintained as highly confidential. To the best of my knowledge, none of this material has been publicly disclosed. As demonstrated with factual particularity below, there are compelling reasons and good cause to seal Meta's highly confidential materials.

6.   For the reasons stated below, this information is highly sensitive, and if publicly disclosed, could significantly prejudice Meta's competitive position by harming Meta's relationships with business partners, developers, and advertisers, putting Meta at unfair disadvantage in future business negotiations, and permitting Meta's competitors to gain an unfair advantage in competition with Meta. For example, the public disclosure of Meta's internal, confidential material could reveal Meta's strategic decision-making and influence the business strategies employed by Meta's competitors by enabling them to mimic Meta's confidential

1   strategies in an effort to attract users or advertisers away from Meta. The disclosure of Meta's

2   confidential material might also give a competitor or a potential business partner unfair leverage

3   in competing against or negotiating with Meta.

4   7.   As a matter of internal policy, Meta and its employees treat as strictly confidential:

5   (1) nonpublic business dealings with third parties, including details of negotiation strategies or

6   specific deal terms; (2) nonpublic financial data or information; (3) nonpublic pricing data or

7   information; (4) nonpublic technical functionality of Meta's products and systems; (5) internal

8   research or analyses, including proprietary methods for conducting that research or analysis;

9   (6) nonpublic business strategies, including internal analyses or discussions of in-development or

10   unreleased products, features, or future plans; and (7) other sensitive information that, if publicly

11   disclosed, could prejudice Meta's business interests. In my experience and to the best of my

12   knowledge, Meta does not disclose internal documents, data, or information of this nature outside

13   of the company, except to authorized third parties when so required or permitted by law or contract.

14   8.   The specific information Meta seeks to seal is identified in the tables below, with

15   numbered rows for the Court's ease of reference:

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No. 3:20-cv-08570-JD   -2-   DECL. OF AMRISH ACHARYA ISO OMNIBUS
                                               MOT. TO SEAL MATERIALS SUBMITTED IN
                                               CONNECTION WITH SUMMARY JUDGMENT
                                               AND *DAUBERT* BRIEFING

Row No.	Dkt. No.	Document or Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
Defendant Meta Platforms, Inc.'s Notice of Motion and Motion For Summary Judgment Regarding First Amended Consolidated Advertiser Class Action Complaint			
1	874-1	18:8-9, between "quid pro-quo—were" and "and that he had 'no basis to believe that'"	This text describes confidential, non-public financial strategy discussions. If revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
2	874-1	18:9, between "pulling back from its" and "investment in premium"	This text contains non-public and confidential information regarding the financial performance of a particular feature of Meta's offerings. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making and internal characterizations and assessments which, for example, could give other parties insights in the performance of Meta's business that could be used to gain an unfair advantage against Meta.

No. 3:20-cv-08570-JD   -3-   DECL. OF AMRISH ACHARYA ISO OMNIBUS MOT. TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH SUMMARY JUDGMENT AND *DAUBERT* BRIEFING

3	874-1	18:25, between "own analysis shows that the" and "allegedly at issue in this agreement"	This text contains non-public and confidential information regarding the advertising spend of a particular advertiser. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an advertiser unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's advertisers and offer specific deal terms designed to undercut those offered by Meta. That advertiser likely also has a reasonable expectation Meta will maintain the confidentiality of this information.
4	874-1	19:28, between "claim accounted for just" and "of Meta's Class Period"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
Defendant Meta Platforms, Inc.'s Notice of Motion and Motion For Summary Judgment Regarding First Amended Consolidated Advertiser Class Action Complaint, Exhibit 1, Excerpts of Expert Merits Report of Michael A. Williams, Ph.D., dated Aug. 5, 2024			
5	874-2	26 ¶ 59, between "FAN accounts for" and "of Facebook's advertising revenues"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.

6	874-2	38 ¶ 94, between "2013 presentation notes that the" and "was generated from local;" between "unsophisticated brands" and "developers and sophisticated brands;" between "developers and sophisticated brands" and "marketers requiring advanced features;" between "marketers requiring advanced features" and "local business;" and after "local business"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
Defendant Meta Platforms, Inc.'s Notice of Motion and Motion For Summary Judgment Regarding First Amended Consolidated Advertiser Class Action Complaint, Exhibit 5, Excerpts of Transcript of Deposition of Tilman Klumpp, held on Mar. 5, 2024			
7	874-6	289:7, between "irrational for Facebook to" and "in -- to make that decision"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
Defendant Meta Platforms, Inc.'s Notice of Motion and Motion For Summary Judgment Regarding First Amended Consolidated Advertiser Class Action Complaint, Exhibit 6, Excerpts of Expert Merits Report of Tilman Klumpp, Ph.D., dated Jan. 12, 2024			
8	874-7	77 ¶ 151, between "others at Facebook, writing:" and "In the same e-mail, Ms. Chang advised that;" between "In the same e-mail, Ms. Chang advised that" and "Ms. Chang testified that;" and after "Zuckerberg on April 30, 2014"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.

| 9 | 874-7 | 79-80 ¶ 157, after "—expressly addresses" | This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates their confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner. |
| 10 | 874-7 | 80 ¶ 158, after "Microsoft agreed as follows:" | This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates their confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner. |

11	874-7	80 ¶ 158 n.353, before "PALM-008914036-056"	This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates their confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner.
12	874-7	81 ¶ 159, between "Microsoft agreed to" and "With this agreement in place"	This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates their confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner.

13	874-7	82 ¶ 164 n.357, between "a January 28, 2015" and "(See PALM-007633377-379.)"	This text contains non-public and confidential information regarding Meta's agreements with a non-party developer, advertiser, or business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers, advertisers, or business partners and offer specific deal terms designed to undercut those offered by Meta.
14	874-7	82-83 ¶ 165 n.358, between "following termination provision:" and "(See PALM-002014487-535"	This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates their confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner.

DECL. OF AMRISH ACHARYA ISO OMNIBUS MOT. TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH SUMMARY JUDGMENT AND *DAUBERT* BRIEFING

| 15 | 874-7 | 84 ¶ 167 n.360, between "at 266" and "PALM-ADI-0001000836-837" | This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates their confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner. |
| 16 | 874-7 | 84-85 ¶ 169 n. 361, between "internal Facebook email describing" and "Bell, K. (January 25;" and after "PALM-FTC-00968368" | This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta. |

DECL. OF AMRISH ACHARYA ISO OMNIBUS MOT. TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH SUMMARY JUDGMENT AND *DAUBERT* BRIEFING

17	874-7	85-86 ¶ 170, between "Directors presentation noted that" and image of "2019 Product Strategy"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
18	874-7	85-86 ¶ 170, image snip between "and social infrastructure." and "Source: PALM-FTC-00968366-404"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
19	874-7	85-86 ¶ 170 n.364, after "*see* PALM-FTC-00967935), at 366"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.

	20	874-7	87-88 ¶ 173, image between "MARCH 2019" and "Source: PALM-006189416-420"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
	Defendant Meta Platforms, Inc.'s Notice of Motion and Motion For Summary Judgment Regarding First Amended Consolidated Advertiser Class Action Complaint, Exhibit 10, Excerpts of Transcript of Deposition of Markus Jakobsson, held on Feb. 22, 2024			
	21	874-11	239:15-18, between "he would like to get." and "These are things that"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
	Defendant Meta Platforms, Inc.'s Notice of Motion and Motion to Exclude Expert Testimony and Opinions of Michael Williams, Exhibit 1, Excerpts of Expert Merits Report of Michael A. Williams, Ph.D., dated Aug. 5, 2024			
	22	876-2	38 ¶ 94, between "2013 presentation notes that the" and "was generated from local;" between "unsophisticated brands" and "developers and sophisticated brands;" between "developers and sophisticated brands" and "marketers requiring advanced features;" between "marketers requiring advanced features" and "local business;" and after "local business"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.

No. 3:20-cv-08570-JD   -11-   DECL. OF AMRISH ACHARYA ISO OMNIBUS MOT. TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH SUMMARY JUDGMENT AND *DAUBERT* BRIEFING

**Defendant Meta Platforms, Inc.'s Notice of Motion and Motion to Exclude Expert Testimony and Opinions of Michael Williams, Exhibit 4, Excerpts of Transcript of Deposition of Scott Fasser, held on Sept. 7, 2023**
23	876-5	181:9, between "I only reviewed the" and "agreements."	This text contains non-public and confidential information regarding Meta's agreements with a non-party developer, advertiser, or business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers, advertisers, or business partners and offer specific deal terms designed to undercut those offered by Meta.
**Defendant Meta Platforms, Inc.'s Notice of Motion and Motion to Exclude Expert Testimony and Opinions of Tilman Klumpp, Exhibit 1, Excerpts of Expert Merits Report of Tilman Klumpp, Ph.D., dated Jan. 12, 2024**
24	878-2	77 ¶ 151, between "others at Facebook, writing:" and "In the same e-mail, Ms. Chang advised that;" between "In the same e-mail, Ms. Chang advised that" and "Ms. Chang testified that;" and after "Zuckerberg on April 30, 2014"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.

No. 3:20-cv-08570-JD   -12-   DECL. OF AMRISH ACHARYA ISO OMNIBUS
                                                    MOT. TO SEAL MATERIALS SUBMITTED IN
                                                    CONNECTION WITH SUMMARY JUDGMENT
                                                    AND *DAUBERT* BRIEFING

25	878-2	79-80 ¶ 157, after "—expressly addresses"	This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates their confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner.
26	878-2	80 ¶ 158, after "Microsoft agreed as follows:"	This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates their confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner.

No. 3:20-cv-08570-JD   -13-   DECL. OF AMRISH ACHARYA ISO OMNIBUS MOT. TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH SUMMARY JUDGMENT AND *DAUBERT* BRIEFING

| 27 | 878-2 | 80 ¶ 158 n.353, before "PALM-008914036-056" | This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates their confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner. |
| 28 | 878-2 | 81 ¶ 159, between "Microsoft agreed to" and "With this agreement in place" | This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates their confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner. |

| 29 | 878-2 | 82 ¶ 164 n.357, between "a January 28, 2015" and "(See PALM-007633377-379.)" | This text contains non-public and confidential information regarding Meta's agreements with a non-party developer, advertiser, or business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers, advertisers, or business partners and offer specific deal terms designed to undercut those offered by Meta. |
| 30 | 878-2 | 82-83 ¶ 165 n.358, between "following termination provision:" and "(*See* PALM-002014487-535" | This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates their confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner. |

DECL. OF AMRISH ACHARYA ISO OMNIBUS
MOT. TO SEAL MATERIALS SUBMITTED IN
CONNECTION WITH SUMMARY JUDGMENT
AND *DAUBERT* BRIEFING

| 31 | 878-2 | 84 ¶ 167 n.360, between "at 266" and "PALM-ADI-0001000836-837" | This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates their confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner. |
| 32 | 878-2 | 84-85 ¶ 169 n. 361, between "internal Facebook email describing" and "Bell, K. (January 25;" and after "PALM-FTC-00968368" | This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta. |

No. 3:20-cv-08570-JD   -16-   DECL. OF AMRISH ACHARYA ISO OMNIBUS MOT. TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH SUMMARY JUDGMENT AND *DAUBERT* BRIEFING

33	878-2	85-86 ¶ 170, between "Directors presentation noted that" and image of "2019 Product Strategy"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
34	878-2	85-86 ¶ 170, image snip between "and social infrastructure." and "Source: PALM-FTC-00968366-404"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
35	878-2	85-86 ¶ 170 n.364, after "*see* PALM-FTC-00967935), at 366"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.

DECL. OF AMRISH ACHARYA ISO OMNIBUS MOT. TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH SUMMARY JUDGMENT AND *DAUBERT* BRIEFING

36	878-2	87-88 ¶ 173, image between "MARCH 2019" and "Source: PALM-006189416-420"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
Defendant Meta Platforms, Inc.'s Notice of Motion and Motion to Exclude Expert Testimony and Opinions of Tilman Klumpp, Exhibit 2, Excerpts of Transcript of Deposition of Tilman Klumpp, held on Mar. 5, 2024			
37	878-3	289:7, between "irrational for Facebook to" and "in -- to make that decision"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.

Defendant Meta Platforms, Inc.'s Notice of Motion and Motion to Exclude Expert Testimony and Opinions of Markus Jakobsson, Exhibit 1, Excerpts of Expert Merits Report of Markus Jakobsson, Ph.D., dated Jan. 12, 2024			
38	880-2	20-21 ¶ 57, between "had developed a so called" and "architecture in which Onavo-installed;" between "so that Onavo's" and "As a Facebook engineer explained;" and after "and Ken Rudin:"	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

| 39 | 880-2 | 22 ¶ 60, after "behavioral information such as" | This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

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| 40 | 880-2 | 24 ¶ 68, between "specific in-app analytics—" and "—that he believed would" | This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

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| 41 | 880-2 | 24-25 ¶ 68, image snip between "figure out how to do this" and "PX 2255 at PALM-016564836" | This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

| 42 | 880-2 | 25-26 ¶ 70, between "URLs are unfortunately uninformative." and "That said—we are" | This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

| 43 | 880-2 | 35 ¶ 94, image between "companies' valuable analytics." and "PX 414 at 6" | This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

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| 44 | 880-2 | 48 ¶ 125, image snip between ""a good job there." and "PX 1747 at PALM-017114236" | This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

| 45 | 880-2 | 50 ¶ 129, image snip between "Sending message" and "We used it to measure" | This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

| 46 | 880-2 | 52-53 ¶ 133, between "Amazon Ads metrics including" and "PX 2256 at PALM-012863801 (Jan. 2019 IAAP Technical Analysis)," encompassing image; and image between "PX 2256 at PALM-012863801 (Jan. 2019 IAAP Technical Analysis)" and "PX 1208 at PALM-014364032-33" | This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

47	880-2	53 ¶ 134, between "YouTube, including" and image beginning "YouTube what data is sent back;" and image snip between "video_type (ad or content)" and "PX 2256 at PALM-012863800 (Jan. 2019 IAAP Technical Analysis)"	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

| 48 | 880-2 | 54-55 ¶ 138, image between "PALM-016895582 at 5584-85" and "Id. at PALM-016895585" | This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

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Defendant Meta Platforms, Inc.'s Notice of Motion and Motion to Exclude Expert Testimony and Opinions of Markus Jakobsson, Exhibit 2, Excerpts of Rebuttal Expert Merits Report of Markus Jakobsson, Ph.D., dated Feb. 9, 2024			
49	880-3	23 ¶ 62 n.25, after "(Zuckerberg, Jun. 2016:"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
50	880-3	24 ¶ 63, between "You should figure out how to do this." and "This seems like an important"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.

	51	880-3	25-26 ¶ 66, between "unfortunately uninformative." and "That said—we are"	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

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| 52 | 880-3 | 27-28 ¶ 71, image after "this at enough detail . . . .'" | This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

| 53 | 880-3 | 33-34 ¶ 77, image after "of IAAP-derived data" | This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

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54	880-3	34-35 ¶ 78, after "Patel, and others, explained:"	This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

55	880-3	35-36 ¶ 79, between "propose that Facebook" and "The second option is;" and between "The second option is" and "by Naveh, Priell,"	This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

| 56 | 880-3 | 36-37 ¶ 80, between "In particular, the first option—" and "—is something that no legitimate" | This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

| 57 | 880-3 | 37 ¶ 81, between "option—the one" and "by Erez Naveh;" and after "team recommends that Facebook" | This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

| 58 | 880-3 | 37 ¶ 82, between "I refer to" and "that Facebook's Erez Naveh;" between "'zero day' because a" and "that would allow a developer like Facebook to;" and between "that would allow a developer like Facebook to" and "to avoid certificate pinning" | This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

| 59 | 880-3 | 38 ¶ 84, between "Naveh and Priell" and "that if Snapchat implements;" and between "its analytics, Facebook" and ", all so that Facebook can continue" | This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

60	880-3	38 ¶ 85, between "their recommended option—" and "However, as a 'Con,' they recognize that;" and after ""However, as a 'Con,' they recognize that"	This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

| 61 | 880-3 | 38-39 ¶ 86, between "involv[ing]' in the" and "in their August 29" | This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

| 62 | 880-3 | 39-40 ¶ 87, between "Priell about 30 days prior:" and "The fact that Facebook would" | This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

63	880-3	40 ¶ 88, after "discussion that included the following:"	This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

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| 64 | 880-3 | 41 ¶ 90, between "suspect acts, including" and "in order to continue Facebook's" | This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

| 65 | 880-3 | 48 ¶ 108, between "dollars to deploy it, and then" and "when this bespoke technical" | This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

| 66 | 880-3 | 52 ¶ 115, between "the Snapchat app, including" and "—was, according to the" | This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

67	880-3	53 ¶ 117, image after "in the same document:"	This document is the performance review of an employee not named in this lawsuit. Its disclosure would publicize employee performance matters with no relevance to the case and violate the reasonable expectation that Meta would maintain the confidentiality of this information. This document also details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

68	880-3	59-60 ¶ 139, between "recommended that Facebook" and "as a response to potential certificate"	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.
Defendant Meta Platforms, Inc.'s Notice of Motion and Motion to Exclude Expert Testimony and Opinions of Markus Jakobsson, Exhibit 3, Excerpts of Advertiser Plaintiffs' Responses and Objections to Meta Platforms, Inc.'s Fifth Set of Interrogatories to Advertiser Plaintiffs			
69	880-4	935:23, between "Role" and "acted as a lead"	This document relates to the performance review of an employee not named in this lawsuit. Its disclosure would publicize employee performance matters with no relevance to the case and violate the reasonable expectation that Meta would maintain the confidentiality of this information.

1	**Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion to Exclude Expert Testimony and Opinions of Markus Jakobsson**			
2	70	886-1	8:9-11, between "Jakobsson Reb. ¶¶ 57-120." and "Ex. 36. Dr. Jakobsson"	This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

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| 71 | 886-1 | 8:12-14, between "jury and the Court—" and ", during the Class Period" | This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

| 72 | 886-1 | 8:18-19, between "program leads recommended" and "to continue the" | This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

73	886-1	8:21, between "capabilities of Pegasus,'" and "*Id.* ¶¶ 86-91"	This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.
Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion to Exclude Testimony of Dr. Tilman Klumpp			
74	888-1	13:18-22, between "end-to-end encryption. ¶173." and "Id. As part of this"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.

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	75	888-1	14:2, between "succeeded in making" and "¶173. The finder-of-fact"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment			
	76	892-1	1:12, between "restricts Apple's" and "Ex. 10. And they will"	This text contains non-public and confidential information regarding Meta's agreements with a non-party developer, advertiser, or business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers, advertisers, or business partners and offer specific deal terms designed to undercut those offered by Meta.

| 77 | 892-1 | 2:10, between "expressly restricted Apple's" and "Ex. 10. The jury will" | This text contains non-public and confidential information regarding Meta's agreements with a non-party developer, advertiser, or business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers, advertisers, or business partners and offer specific deal terms designed to undercut those offered by Meta. |
| 78 | 892-1 | 9:15-16, between "(limiting Apple's" and "Others, too, acknowledged" | This text contains non-public and confidential information regarding Meta's agreements with a non-party developer, advertiser, or business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers, advertisers, or business partners and offer specific deal terms designed to undercut those offered by Meta. |

| 79 | 892-1 | 13:25-26 n.5, between "competitively important" and "Exs. 35, 36 at 8435-36, followed by" | This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |
| 80 | 892-1 | 17:10-13, between "Apple was restricted from" and "Ex. 10 at 9817; *see* Ex. 40" | This text contains non-public and confidential information regarding Meta's agreements with a non-party developer, advertiser, or business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers, advertisers, or business partners and offer specific deal terms designed to undercut those offered by Meta. |

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81	892-1	20:16-17, between "delivered Oct. 2018, showing" and "budget reduction across;" between "content, with a" and "and an additional;" and between "and an additional" and "In 2018, Netflix increased"	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products that reveal competitively sensitive information, including how Meta's products and services operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.
82	892-1	20:18-19, between "Meta ad spend to a record" and ", Ex. 94 at 0031;"	This text contains non-public and confidential information regarding the advertising spend of a particular advertiser. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an advertiser unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's advertisers and offer specific deal terms designed to undercut those offered by Meta. That advertiser likely also has a reasonable expectation Meta will maintain the confidentiality of this information.

			Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 1, Expert Merits Report of Michael A. Williams, dated Aug. 5, 2024
83	892-3	13-14 ¶ 29 n.26, between "an internal email that Facebook" and "(PX 594). On December 3, 2019;" and between "Stephanie Wang wrote that" and "(PALM-016888726-727, at 727)"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
84	892-3	16 ¶ 34, after "The logs are then processed for:"	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction, ad targeting and delivery systems, or data tables. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
85	892-3	18-19 ¶ 40, between "Facebook's advertising strategy of" and "Mr. Jakubowski confirmed"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.

	86	892-3	23-24 ¶ 53, after "a 2020 Facebook document states:"	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction, ad targeting and delivery systems, or data tables. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
	87	892-3	38 ¶ 94, between "2013 presentation notes that the" and "was generated from local;" between "unsophisticated brands" and "developers and sophisticated brands;" between "developers and sophisticated brands" and "marketers requiring advanced features;" between "marketers requiring advanced features" and "local business;" and after "local business"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
	88	892-3	26 ¶ 59, between "FAN accounts for" and "of Facebook's advertising revenues"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
	89	892-3	69 ¶ 186, between "the meeting brief states:" and "Similarly, in another email exchange"	This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates the nonparty's confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not a party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations.

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90	892-3	69-70 ¶ 187, after "these business segments as:"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
91	892-3	69-70 ¶ 187 n.263, between "customers into type," and "(PALM-008265252, pp. 86-89)"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
92	892-3	71-72 ¶ 192, between "relevant ads by" and "This means that advertisers can"	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction, ad targeting and delivery systems, or data tables. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.

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93	892-3	72 ¶ 193, after "and under it,"	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction, ad targeting and delivery systems, or data tables. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
94	892-3	72-73 ¶ 195, after "of bids is calculated by"	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction, ad targeting and delivery systems, or data tables. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
95	892-3	73 ¶ 196, entire paragraph	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction, ad targeting and delivery systems, or data tables. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.

96	892-3	73 ¶ 197, entire paragraph	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction, ad targeting and delivery systems, or data tables. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
97	892-3	73 ¶ 198, image between "EQUATION TO ASCERTAIN ROI" and "Source: PALM-010596417"	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction, ad targeting and delivery systems, or data tables. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
98	892-3	73 ¶ 198 n.274, between "it states that" and "(*See* PALM-007648629,"	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction, ad targeting and delivery systems, or data tables. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.

99	892-3	75 ¶ 202, between "based on targeting" and "This strategy is depicted"	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction, ad targeting and delivery systems, or data tables. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
100	892-3	75-77 ¶ 202, image between "REVENUE PER IMPRESSION" and "Source: PALM-005396091;" image between "FACEBOOK PRICING STRATEGY" and "Source: PALM-005396091;" and image between "DETERMINE TRUE VALUE" and "Source: PALM-005396091"	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction, ad targeting and delivery systems, or data tables. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
101	892-3	80-81 ¶ 207, image between "OVER TIME IN THE U.S." and "Source: PALM-014824975"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
102	892-3	82-83 ¶ 210, after "It was found that"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
103	892-3	82-83 ¶ 210 n.299, before "*See* PALM-006846145-154, at 147"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.

	104	892-3	83 ¶ 211, between "prices, which was" and "Demand rose because advertisers were," and after "Demand rose because advertisers were"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
	105	892-3	83 ¶ 212, between "growth, stating that" and "The result was contrary;" between "increased prices, the business" and "Thus, the document concluded;" between "[t]his suggests that" and "Such drivers led to;" and after "a later 2018 document, since"	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction, ad targeting and delivery systems, or data tables. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
	106	892-3	85-86 ¶ 217, between "own data, more than" and of advertisers on Facebook;" between "purchases in no more than" and "of the available 138 months;" between "Figure 19, more than" and "of advertisers on Facebook;" and between "total ad spend of less than" and "in the entire data period"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
	107	892-3	85-86 ¶ 217, image between "THROUGH JUNE 2022" and "Source: Meta, 'RFP 78 Data,' PALM-017052724"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
	108	892-3	87 ¶ 217, image between "THROUGH JUNE 2022" and "g. *Specialized vendors*"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.

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109	892-3	92-93 ¶ 235, image between "OVER TIME IN THE U.S." and "Source: PALM-014824975"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
110	892-3	131 ¶ 312, between "social advertising were between" and "To calculate Facebook's revenue," and between "is expected to be at least" and "in the period 2017-2020"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
111	892-3	131 ¶ 314, after "cap and explained that Facebook's"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
112	892-3	152 ¶ 363 n.587, between "produced by Facebook, out of" and "advertisers that purchased ads;" between "in the Class Period, just" and "of those advertisers;" between "Facebook's stated goal was for the" and "As stated in a Facebook document;" and between "frequency ('RF')] is" and "PALM-015191749-754"	This information reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.
113	892-3	203 at TABLE A1, Row 11 of Column 1 (PALM-006480355), after "social advertising were between"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.

114	892-3	204 at TABLE A1, Row 17 of Column 1 (PALM-014096958-994), after "from February 2019 notes that"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
		**Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 2, Expert Report of Michael A. Williams, Ph.D., May 24, 2024**	
115	892-3	8 ¶ 17, between "which accounted for" and "of Facebook's ad revenue"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
116	892-3	8 ¶ 17, between "ranging from" and "Projections suggested it;" and between "would remain above" and "from 2017-2020"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
117	892-3	31 ¶ 66 n.64, between "Facebook, out of" and "advertisers that purchased;" between "the Class Period, just" and "of those advertisers;" between "Facebook's stated goal was for the" and "As stated in a Facebook document;" and between "margin on [reach and frequency ('RF')] is" and "PALM-015191749-754"	This information reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.

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colspan=4	**Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 3, Expert Reply Report of Michael A. Williams, Ph.D., dated July 8, 2024**		
118	892-3	8-9 ¶ 28 n.24, between "Meta was associated with" and "of the ad spend;" between "targeting is associated with over" and "of ad spend;" between "geographic targeting is associated with over" and "of ad spend;" and between "There is" and "ad spend associated only"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
119	892-3	9 ¶ 30, between "age targeting was associated with over" and "of ad spend;" and between "geographic targeting was associated with over" and "of ad spend"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
120	892-3	17-18 ¶ 48, image between "FACEBOOK'S COST AND CAPITAL" and "Source: PALM-014824975"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
121	892-3	19 ¶ 50, between "in order to meet our financial goals," and "Plaintiffs have not alleged;" and between "evidence indicating) that Meta's" and "across-the-board cut"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
122	892-3	19 ¶ 51, between "e-mailed Fidji Simo, cutting nearly" and "from Watch's budget for;" and between "programming, while adding" and "towards creators and gaming"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.

123	892-3	23 ¶ 51 n.53, between "we suggested considering cutting" and "from originals + sports;" and between "next year and adding" and "towards creators and gaming"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
124	892-3	34 ¶ 90 n.99, between "FAN ads accounted for" and "of Facebook's ad revenue"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
125	892-3	44-45 ¶ 114, image between "CTR INDEX FOR META ADS" and "Source: PALM-014347024"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
126	892-3	55 ¶ 142, between "Class Period is nearly" and ". In addition;" between ". In addition" and "of advertisers purchased at least;" between "of advertisers purchased at least" and "Facebook impressions in;" between "chance that an advertiser that purchased" and "Facebook impressions purchased;" between "by the alleged conduct is over" and ". That is, at least;" between ". That is, at least" and "of advertisers have a more than;" and between "of advertisers have a more than" and "chance of being injured"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.

127	892-3	60 ¶ 154, between "points out that Meta budgeted" and "in 2018 for ad coupons;" between "investigation reveals that only" and "was earmarked;" between "Parties' while" and "was allocated to;" and between "members were less than" and "of Meta's advertising revenue"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
128	892-3	60 ¶ 155, between "buying reached as high as" and "during the class period;" between "by Facebook, out of" and "advertisers that purchased ads;" and between "in the Class Period, just" and "of those advertisers only"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
129	892-3	60 ¶ 155 n.191, between "just stick with staying at" and "of total ad revenue"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
130	892-3	61 ¶ 157, between "Facebook's stated goal is" and "Indeed some advertisers use"	This information reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.

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131	892-3	61 ¶ 157 n.195, between "[reach and frequency ('RF')] is" and "PALM-015191749-754"	This information reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.
132	892-3	72-75 at Appendix II, all images between "SUPPLEMENTAL TABLES AND FIGURES" and "Source: Tucker Report"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 4, Expert Merits Report of Tilman Klumpp, Ph.D., dated Jan. 12, 2024			
133	892-5	17-18 ¶ 42, between "In a January 2018" and "In late 2018"	This text contains non-public and confidential information regarding Meta's agreements with a non-party developer, advertiser, or business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers, advertisers, or business partners and offer specific deal terms designed to undercut those offered by Meta.

| | 134 | 892-5 | 17-18 ¶ 42, after "In a 2018 self-review," | This document is the performance review of an employee not named in this lawsuit. Its disclosure would publicize employee performance matters with no relevance to the case and violate the reasonable expectation that Meta would maintain the confidentiality of this information. This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |
| | 135 | 892-5 | 41-42 ¶ 87, between "EBDA. And:" and "On June 18 2018" | This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information. |

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136	892-5	48-49 ¶ 103 n.178, between "Dec. 6, 2016 presentation identifying" and "PALM-005452186-195;" between "Nov. 27, 2017 emails:" and "PALM-005487488-495;" and after "May 25, 2018 Zuckerberg email:"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
137	892-5	49-50 ¶ 105 n.183, between "Dec. 6, 2016 presentation identifying" and "PALM-005452186-195;" and after "Nov. 27, 2017 emails:"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
138	892-5	59-60 ¶ 119, between "Facebook planned to spend nearly" and "in the first part-year;" and after "competitive analysis concluded that"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
139	892-5	60-61 ¶ 120 n.239, after "PALM-003130978"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
140	892-5	61-62 ¶ 122, between "Mr. Hastings explained that" and "The same notes advised"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.

141	892-5	73 ¶ 142, after "Microsoft informed Facebook that"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
142	892-5	73-74 ¶ 143, after "Mr. Vernal agreed, e-mailing:"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
143	892-5	74 ¶ 144, after "Mr. Daniels confirmed that"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.

144	892-5	74 ¶ 145, between "Facebook that Microsoft wanted" and ", and that a user's Facebook;" between "at Facebook that it was" and "Ms. White replied later;" and after "the same e-mail chain that"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
145	892-5	76-77 ¶ 151, between "Facebook executives" and "For example, on July 9;" between "others at Facebook, writing:" and "In the same e-mail, Ms. Chang advised that;" between "In the same e-mail, Ms. Chang advised that" and "Ms. Chang testified that;" and after "Zuckerberg on April 30, 2014"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.

| 146 | 892-5 | 79-80 ¶ 157, after "—expressly addresses" | This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates the nonparty's confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not a party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner. |
| 147 | 892-5 | 80 ¶ 158, after "Microsoft agreed as follows:" | This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates the nonparty's confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not a party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner. |

| 148 | 892-5 | 80 ¶ 158 n.353, before "PALM-008914036-056" | This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates the nonparty's confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not a party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner. |
| 149 | 892-5 | 81 ¶ 159, between "Microsoft agreed to" and "With this agreement in place" | This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates the nonparty's confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not a party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner. |

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150	892-5	82 ¶ 164 n.357, between "a January 28, 2015" and "(See PALM-007633377-379.)"	This text contains non-public and confidential information regarding Meta's agreements with a non-party developer, advertiser, or business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers, advertisers, or business partners and offer specific deal terms designed to undercut those offered by Meta.
151	892-5	82-83 ¶ 165 n.358, between "following termination provision:" and "(*See* PALM-002014487-535"	This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates the nonparty's confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not a party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner.

152	892-5	84 ¶ 167 n.360, between "at 266" and "PALM-ADI-0001000836-837"	This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates the nonparty's confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not a party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner.
153	892-5	84-85 ¶ 169 n. 361, between "internal Facebook email describing" and "Bell, K. (January 25;" and after "PALM-FTC-00968368"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.

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154	892-5	85-86 ¶ 170, between "Directors presentation noted that" and image of "2019 Product Strategy"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
155	892-5	85-86 ¶ 170, image snip between "and social infrastructure." and "Source: PALM-FTC-00968366-404"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
156	892-5	85-86 ¶ 170 n.364, after "*see* PALM-FTC-00967935), at 366"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.

157	892-5	87-88 ¶ 173, image between "MARCH 2019" and "Source: PALM-006189416-420"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 5, Expert Rebuttal Report of Tilman Klumpp, Ph.D., Feb. 9, 2024			
158	892-5	31-32 ¶ 76, between "own internal documents recognize that" and "It is also true that, in economics"	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products, services, or advertising platform that reveal competitively sensitive information, including how users or advertisers use and value Meta's products, services, or advertising platform, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.

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159	892-5	31-32 ¶ 76 n.79, between "'CRD update' presentation stating" and "PALM-005484912 at 921"	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products, services, or advertising platform that reveal competitively sensitive information, including how users or advertisers use and value Meta's products, services, or advertising platform, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.
160	892-5	49 ¶ 119, between "Stories ads increased from" and "in 2017 to;" between "in 2017 to" and "in 2020' and that;" between "Stories ads increased from" and "in 2017 to;" and between "in 2017 to" and "in 2020.' He then"	This information contains nonpublic and confidential data or research regarding internal user, transaction, or app performance data, including proprietary methods for obtaining that data or conducting that research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research on U.S. users and advertisers and how they distinguish themselves from Meta in the eyes of U.S. users and advertisers.

161	892-5	50 ¶ 122, between "indicates that Facebook was" and "during the Class Period"	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products, services, or advertising platform that reveal competitively sensitive information, including how users or advertisers use and value Meta's products, services, or advertising platform, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.
162	892-5	50 ¶ 122 n.143, between "PALM-010815939 at 940" and "PALM-002996507 at slide 20;" and after "PALM-002996507 at slide 20"	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products, services, or advertising platform that reveal competitively sensitive information, including how users or advertisers use and value Meta's products, services, or advertising platform, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.
163	892-5	50-51 ¶ 123, between "CPM for these advertisers and ads" and "Dr. Tadelis' Exhibit 4 does"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.

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164	892-5	71 ¶ 170, between "Meta AN contributed" and "of Facebook's total ad inventory"	This information contains nonpublic and confidential data or research regarding internal user, transaction, or app performance data, including proprietary methods for obtaining that data or conducting that research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research on U.S. users and advertisers and how they distinguish themselves from Meta in the eyes of U.S. users and advertisers.
165	892-5	71-72 ¶ 171, between "fluctuated between approximately" and "(roughly consistent with the figure;" between "continued to fall, reaching" and "of Facebook's total impressions;" and image between "TOTAL FACEBOOK AD IMPRESSIONS" and "Source: PALM-017138970"	This information contains nonpublic and confidential data or research regarding internal user, transaction, or app performance data, including proprietary methods for obtaining that data or conducting that research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research on U.S. users and advertisers and how they distinguish themselves from Meta in the eyes of U.S. users and advertisers.

	166	892-5	72-73 ¶ 172, between "it still fell from approximately" and "in the months leading up;" between "to the GNBA to about" and "in the months after;" and image between "TOTAL FACEBOOK AD REVENUE" and "Source: PALM-017138970"	This information contains nonpublic and confidential data or research regarding internal user, transaction, or app performance data, including proprietary methods for obtaining that data or conducting that research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research on U.S. users and advertisers and how they distinguish themselves from Meta in the eyes of U.S. users and advertisers.
	167	892-5	73-74 ¶ 173, between "this share was below" and "while it had not been;" between "while it had not been" and "in at any time within;" and between "TOTAL FACEBOOK AD CLICKS" and "Source: PALM-017138970"	This information contains nonpublic and confidential data or research regarding internal user, transaction, or app performance data, including proprietary methods for obtaining that data or conducting that research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research on U.S. users and advertisers and how they distinguish themselves from Meta in the eyes of U.S. users and advertisers.

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	168	892-5	81 ¶ 189 n.258, after "PALM-016717997 (5/24/2018)"	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction, ad targeting and delivery systems, or data tables. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
	169	892-5	81-82 ¶ 190, between "Facebook would have needed" and "Google's documents further indicate"	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction, ad targeting and delivery systems, or data tables. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
	170	892-5	81-82 ¶ 190 n.262, between "See PALM-015703568 at 71-72" and "Emphasis in original"	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction, ad targeting and delivery systems, or data tables. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.

	171	892-5	87-88 ¶ 202, after "June 14, 2018 Facebook document"	This text contains non-public and confidential information regarding Meta's agreements with a non-party developer, advertiser, or business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers, advertisers, or business partners and offer specific deal terms designed to undercut those offered by Meta.
	172	892-5	88 ¶ 204, after "tax on transactions—in fact,"	This text contains non-public and confidential information regarding Meta's agreements with a non-party developer, advertiser, or business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers, advertisers, or business partners and offer specific deal terms designed to undercut those offered by Meta.

	173	892-5	91 ¶ 210, between "eventually signing the GNBA," and "With the GNBA"	This text contains non-public and confidential information regarding Meta's agreements with a non-party developer, advertiser, or business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers, advertisers, or business partners and offer specific deal terms designed to undercut those offered by Meta.
	174	892-5	93-94 ¶ 215, between "Facebook's internal documents make clear" and "Third, when Facebook signed"	This text contains non-public and confidential information regarding Meta's agreements with a non-party developer, advertiser, or business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers, advertisers, or business partners and offer specific deal terms designed to undercut those offered by Meta.

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175	892-5	93-94 ¶ 215 n.301, between "PALM-013771480 (4/15/2019)" and "emphasis added); PALM-013541405;" and after "emphasis added); PALM-013541405"	This text contains non-public and confidential information regarding Meta's agreements with a non-party developer, advertiser, or business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers, advertisers, or business partners and offer specific deal terms designed to undercut those offered by Meta.
176	892-5	96 ¶ 220, after "strategy at the time) reply as follows:"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
177	892-5	96 ¶ 221, between "quote provided by Dr. Tadelis:" and "Ms. Simo further explains that;" and after "Ms. Simo further explains that"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.

	178	892-5	96 ¶ 221 n.314, between "PALM-005950959-966 at 963" and "See also"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
	179	892-5	97 ¶ 222, between "*less* likely for Facebook to" and "I interpret Ms. Simo's response"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
	180	892-5	97 ¶ 223, between "Sandberg, stating that" and "Dr. Tadelis puts forth no"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.

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	181	892-5	98 ¶ 225, after "that's where the demand was,"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
	182	892-5	98 ¶ 226, after "belying Mr. Edie's claim that"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
	183	892-5	98-99 ¶ 227, after "This belies Mr. Eide's claim that"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.

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| 184 | 892-5 | 99 ¶ 229, between "reduce the budget for original content and" and "improved user engagement;" and between "document suggesting that such" and "Moreover, as discussed in Section III" | This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta. |
| 185 | 892-5 | 110 ¶ 254, between "to 2017 represents only" and "of 2017 ad spend;" and between "2018 represents only" and "of 2018 ad spend on" | This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta. |

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186	892-5	110 ¶ 255, between "data and calculations, the" and "figures he discusses are based on a;" between "figures he discusses are based on a" and "increase in Netflix ad spend;" between "from 2016 to 2017 and a" and "increase in Netflix ad spend;" between "Facebook in 2017 and 2018—" and "respectively—shows;" between "Netflix's ad spend accounted for" and "of the total spend on ad venues;" between "market in 2017, and for" and "in 2018. Moreover, if the;" between "in 2018. Moreover, if the" and "Netflix spent on advertising;" and between "would have amounted to between" and "of revenue increase"	This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
187	892-5	116-17 ¶ 270, between "A January 28, 2015" and "All of these features would"	This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates the nonparty's confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not a party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations.

DECL. OF AMRISH ACHARYA ISO OMNIBUS
MOT. TO SEAL MATERIALS SUBMITTED IN
CONNECTION WITH SUMMARY JUDGMENT
AND *DAUBERT* BRIEFING

188	892-5	128 ¶ 303, between "injected by F3 for CTR_MBL_FEED" and "Dr. Tadelis cites a second;" between "which explains that" and "I do not know if ;" between "I do not know if" and "whether 'features backfilled;" between "most features of F3, or what" and "refers to;" between "as measured by Meta's" and "they only support a finding of a;" between "they only support a finding of a" and "and only for;" and after "and only for"	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction, ad targeting and delivery systems, or data tables. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
189	892-5	129 ¶ 306 n.431, after "removing duplicative features',"	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction, ad targeting and delivery systems, or data tables. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
190	892-5	135-36 ¶ 319 n.450, after "*See* PALM-FTC-00967935), at 366"	This text contains non-public and confidential information regarding risks, priorities, and internal strategy relating to advertising on Meta's products, including with respect to specific advertisers or specific types of advertisers. If publicly revealed, this information could cause Meta competitive harm by giving other parties insight into Meta's strategic considerations and thus a competitive advantage over Meta in ongoing or future business negotiations.

			Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 6, Expert Merits Report of Markus Jakobsson, Ph.D., dated Jan. 12, 2024
191	892-7	20-21 ¶ 57, between "had developed a so-called" and "architecture in which Onavo-installed;" between "so that Onavo's" and "As a Facebook engineer explained;" and after "and Ken Rudin:"	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

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192	892-7	22 ¶ 60, after "behavioral information such as"	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.
193	892-7	24 ¶ 68, between "specific in-app analytics—" and "—that he believed would"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.

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194	892-7	24-25 ¶ 68, image snip between "figure out how to do this" and "PX 2255 at PALM-016564836"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
195	892-7	25-26 ¶ 70, between "URLs are unfortunately uninformative." and "That said—we are"	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

| 196 | 892-7 | 35 ¶ 94, image between "companies' valuable analytics." and "PX 414 at 6" | This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

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| 197 | 892-7 | 48 ¶ 125, image snip between ""a good job there." and "PX 1747 at PALM-017114236" | This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

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198	892-7	50 ¶ 129, image snip between "Sending message" and "We used it to measure"	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.
199	892-7	52-53 ¶ 133, between "Amazon Ads metrics including" and "PX 2256 at PALM-012863801 (Jan. 2019 IAAP Technical Analysis)," encompassing image; and image between "PX 2256 at PALM-012863801 (Jan. 2019 IAAP Technical Analysis)" and "PX 1208 at PALM-014364032-33"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.

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200	892-7	53 ¶ 134, between "YouTube, including" and image beginning "YouTube what data is sent back;" and image snip between "video_type (ad or content)" and "PX 2256 at PALM-012863800 (Jan. 2019 IAAP Technical Analysis)"	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.
201	892-7	54-55 ¶ 138, image between "PALM-016895582 at 5584-85" and "Id. at PALM-016895585"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.

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Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 7, Rebuttal Expert Merits Report of Markus Jakobsson, Ph.D., Feb. 9, 2024			
202	892-7	23 ¶ 62 n.25, after "(Zuckerberg, Jun. 2016:"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
203	892-7	24 ¶ 63, between "You should figure out how to do this." and "This seems like an important"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.

| 204 | 892-7 | 25-26 ¶ 66, between "unfortunately uninformative." and "That said—we are" | This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

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205	892-7	27-28 ¶ 71, image after "this at enough detail . . . .'"	This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

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| 206 | 892-7 | 33-34 ¶ 77, image after "of IAAP-derived data" | This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

207	892-7	34-35 ¶ 78, after "Patel, and others, explained:"	This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

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208	892-7	35-36 ¶ 79, between "propose that Facebook" and "The second option is;" and between "The second option is" and "by Naveh, Priell,"	This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

| 209 | 892-7 | 36-37 ¶ 80, between "In particular, the first option—" and "—is something that no legitimate" | This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

| 210 | 892-7 | 37 ¶ 81, between "option—the one" and "by Erez Naveh;" and after "team recommends that Facebook" | This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

| 211 | 892-7 | 37 ¶ 82, between "I refer to" and "that Facebook's Erez Naveh;" between "'zero day' because a" and "that would allow a developer like Facebook to;" and between "that would allow a developer like Facebook to" and "to avoid certificate pinning" | This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

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| 212 | 892-7 | 38 ¶ 84, between "Naveh and Priell" and "that if Snapchat implements;" and between "its analytics, Facebook" and ", all so that Facebook can continue" | This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

213	892-7	38 ¶ 85, between "their recommended option—" and "However, as a 'Con,' they recognize that;" and after ""However, as a 'Con,' they recognize that"	This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

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| 214 | 892-7 | 38-39 ¶ 86, between "involv[ing]' in the" and "in their August 29" | This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

| 215 | 892-7 | 39-40 ¶ 87, between "Priell about 30 days prior:" and "The fact that Facebook would" | This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

216	892-7	40 ¶ 88, after "discussion that included the following:"	This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

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| 217 | 892-7 | 41 ¶ 90, between "suspect acts, including" and "in order to continue Facebook's" | This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

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218	892-7	48 ¶ 108, between "dollars to deploy it, and then" and "when this bespoke technical"	This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.
219	892-7	52 ¶ 115, between "the Snapchat app, including" and "—was, according to the"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.

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| 220 | 892-7 | 53 ¶ 117, image after "in the same document:" | This document is the performance review of an employee not named in this lawsuit. Its disclosure would publicize employee performance matters with no relevance to the case and violate the reasonable expectation that Meta would maintain the confidentiality of this information. This document also details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

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| 221 | 892-7 | 59-60 ¶ 139, between "recommended that Facebook" and "as a response to potential certificate" | This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

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Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 10			
222	892-9	Entire document	This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer, who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.
Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 11			
223	892-9	Entire document	This information contains non-public and confidential data regarding in-development or unreleased user or advertising products, features, or business plans for Meta's products or services. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors market themselves to U.S. users or advertisers and how they distinguish themselves from Meta in the eyes of U.S. users or advertisers.

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	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 13, PX-2857 Priell Deposition		
224	892-9	Entire document	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 14, PX-414 Olivan Deposition			
225	892-9	PALM-010629831-832, content of "Friday, July 22, 2016 8:33 AM" email below subject line "A/C Priv - Onavo Research Taskforce Status Update"	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

226	892-9	Email addresses of Meta employees as highlighted in exhibit	This text reveals email addresses of current or former employees of Meta. These current or former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Meta.
227	892-9	1-6, entire slides with notes following "Document produced only in native format."	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

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Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 15, PX-2256 Zuckerberg Deposition			
228	892-9	PALM-012863800 between "everything we collected is still there" and "Per App/Dataset Info"	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. decision-making

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| 229 | 892-9 | PALM-012863800 between "video_type (ad or content)" and "Snapchat" | This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

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230	892-9	PALM-012863801 before "We used it to measure"	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

231	892-9	PALM-012863801 between "raw form by MS team and others" and "Summary of types of analyses conducted"	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

| 232 | 892-9 | PALM-012863802-823, everything after "Appendix: VPNLess - VPNLess.key Contact Support" | This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This text reveals personal information about current or former employees of Meta. These current or former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. |

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 16			
233	892-9	Email addresses of Meta employees as highlighted in exhibit	This text reveals email addresses of current or former employees of Meta. These current or former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Meta.
Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 18, PX-2255 Zuckerberg Deposition			
234	892-9	Email addresses of Meta employees as highlighted in exhibit	This text reveals email addresses of current or former employees of Meta. These current or former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Meta.

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Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 19, PX-2984 Zervas Deposition			
235	892-9	Entire document	This document is the performance review of an employee not named in this lawsuit. Its disclosure would publicize employee performance matters with no relevance to the case and violate the reasonable expectation that Meta would maintain the confidentiality of this information. This document also details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 20, PX-2861 Priell Deposition			
236	892-9	Email addresses of Meta employees as highlighted in exhibit	This text reveals email addresses of current or former employees of Meta. These current or former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Meta.
Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 21			
237	892-10	Entire document	This document contains nonpublic and confidential data or research regarding internal user data, including proprietary methods for obtaining that data or conducting that research. This information has never been disclosed publicly and the Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research.
Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 24, PX-557 Schultz Deposition			
238	892-10	PALM-014640333-338, between "DAVOS - GOVERNMENT MEETINGS" and "Other Meetings"	This text describes bilateral meetings with government officials as well as senior executives from current and potential business partners of Meta. This text contains confidential, non-public information regarding a non-party and implicates the nonparty's confidentiality interests, by revealing the identity of an individual who is not a party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of statements made during potential partnership conversations.

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 26			
239	892-10	Entire document	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These figures are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 28			
240	892-10	Email addresses of Meta employees as highlighted in exhibit	This text reveals email addresses of current or former employees of Meta. These current or former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Meta.

DECL. OF AMRISH ACHARYA ISO OMNIBUS
MOT. TO SEAL MATERIALS SUBMITTED IN
CONNECTION WITH SUMMARY JUDGMENT
AND *DAUBERT* BRIEFING

		Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 29, PX-116 Parikh Deposition	
241	892-10	Email addresses of Meta employees as highlighted in exhibit	This text reveals email addresses of current or former employees of Meta. These current or former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Meta.
242	892-10	PALM-012927516, between "Pedro Canahuati (1/30/2019 11:38:19 PST):" and "Pedro Canahuati (1/30/2019 11:38:32 PST);" between "Pedro Canahuati (1/30/2019 11:38:32 PST):" and "Jay Parikh (1/30/2019 11:39:13 PST);" and between "Pedro Canahuati (1/30/2019 11:39:15 PST):" and "Jay Parikh (1/30/2019 11:39:30 PST):"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
243	892-10	PALM-012927516, between "Jay Parikh (1/30/2019 11:39:40 PST):" and "Jay Parikh (1/30/2019 11:40:18 PST):"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.

DECL. OF AMRISH ACHARYA ISO OMNIBUS MOT. TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH SUMMARY JUDGMENT AND *DAUBERT* BRIEFING

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 32, PX-2215 Naveh Deposition			
244	892-10	Email addresses of Meta employees as highlighted in exhibit	This text reveals email addresses of current or former employees of Meta. These current or former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Meta.
Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 34 PX-1747 Wei Deposition			
245	892-10	Email addresses of Meta employees as highlighted in exhibit	This text reveals email addresses of current or former employees of Meta. These current or former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Meta.

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Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 36			
246	892-10	Entire document	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta..

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 40			
247	892-10	Entire document	This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer, who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 41			
248	892-11	Entire document	This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer, who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 42			
249	892-11	Entire document	This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer, who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 43			
250	892-11	Entire document	This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer, who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 44			
251	892-11	Entire document	This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer, who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 45			
252	892-11	Entire document	This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer, who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.

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Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 46			
253	892-11	Entire document	This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer, who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 47			
254	892-11	Entire document	This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer, who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.
Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 48			
255	892-11	Entire document	This text contains confidential, non-public information regarding a business partner and implicates the nonparty's confidentiality interests, by revealing the identity of a Meta business partner who is not a party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations.

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 49			
256	892-11	Entire document	This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer, who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 50			
257	892-11	Entire document	This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer, who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.

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Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 51			
258	892-11	Entire document	This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer, who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.

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Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 52			
259	892-11	Entire document	This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer, who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 53			
260	892-11	Entire document	This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer, who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 54			
261	892-11	Entire document	This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer, who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.

		Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 55		
262	892-11	Entire document		This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer, who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 56			
263	892-11	Entire document	This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer, who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 57			
264	892-11	Entire document	This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer, who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.

			Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 58	
265	892-11	Entire document	This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer, who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 59			
266	892-11	Entire document	This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer, who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 61 PX-1322 Chang Deposition			
267	892-12	Entire document	This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer, who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.
Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 63			
268	892-12	PALM-012438856-858, between "Section 2: The Standard Terms of the Company's Agreements or licenses with Application Developers" and "Section 3: Integration Partnerships"	This text describes specific contract terms between Meta and app developers. This text contains confidential, non-public information regarding a non-party developer. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers.

No. 3:20-cv-08570-JD   -153-   DECL. OF AMRISH ACHARYA ISO OMNIBUS MOT. TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH SUMMARY JUDGMENT AND *DAUBERT* BRIEFING

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 64			
269	892-12	Entire document	This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer, who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 65			
270	892-12	Entire document	This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer, who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.
Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 67			
271	892-12	Entire document	This document describes specific contract terms between Meta and Google. This text contains non-public and confidential information regarding Meta's agreements with a business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad venue unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 68			
272	892-12	Entire document	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

No. 3:20-cv-08570-JD   -156-   DECL. OF AMRISH ACHARYA ISO OMNIBUS MOT. TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH SUMMARY JUDGMENT AND *DAUBERT* BRIEFING

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 70 PX-1295 Jakubowski Deposition			
273	892-12	Entire document	This document describes the negotiation of specific contract terms between Meta and Google. This text contains non-public and confidential information regarding Meta's agreements with a business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad venue or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.
Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 71			
274	892-12	Entire document	This document describes specific contract terms between Meta and Google. This text contains non-public and confidential information regarding Meta's agreements with a business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad venue unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.

DECL. OF AMRISH ACHARYA ISO OMNIBUS MOT. TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH SUMMARY JUDGMENT AND *DAUBERT* BRIEFING

		Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 72, PX-1711 Crum Deposition		
275	892-12	Email addresses of Meta employees as highlighted in exhibit	This text reveals email addresses of current or former employees of Meta. These current or former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Meta.
		Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 73, PX-1712 Crum Deposition	
276	892-12	Entire document	This document describes specific contract terms between Meta and Google. This text contains non-public and confidential information regarding Meta's agreements with a business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad venue unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.

**Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 74, PX-1922 Sandberg Deposition**
277	892-12	Entire document	This document details confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products, services, or advertising platform that reveal competitively sensitive information, including how users or advertisers use and value Meta's products, services, or advertising platform, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.
**Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 75, PX-1921 Sandberg Deposition**
278	892-12	Email addresses of Meta employees as highlighted in exhibit	This text reveals email addresses of current or former employees of Meta. These current or former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Meta.

No. 3:20-cv-08570-JD   -159-   DECL. OF AMRISH ACHARYA ISO OMNIBUS MOT. TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH SUMMARY JUDGMENT AND *DAUBERT* BRIEFING

279	892-12	PALM-006209593, between "We've negotiated a partnership with" and "We're nearly ready to sign;" and between "Here's a high-level summary" and "-Dan" of "March 16, 2018 12:34 PM" email	This text contains non-public and confidential information regarding Meta's agreements with a business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad venue unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.
280	892-12	PALM-006209594, between "Today" and "AN is sub scale because it;" and between "Future" and "How do we sclae to achieve goal" of "February 27, 2018 at 4:33 AM" email	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
281	892-12	PALM-006209594, between "(and get our fair share of publisher ecosystem)" and "of the $52B publisher ecosystem" of "February 27, 2018 at 4:33 AM" email	This text contains non-public and confidential information regarding Meta's agreements with a business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad venue unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.

	282	892-12	PALM-006209595, between "Criteo and MediaNet would be launch partners." and "What happens if we don't follow recommendation to partner with ad tech" of "February 27, 2018 at 4:33 AM" email	This text contains non-public and confidential information regarding Meta's agreements with a business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad venue unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.
	283	892-12	PALM-006209595-596, between "tax at the end of the first term (3.5 yrs)" and "Partners renege on their contractual obligations;" between "training data for their ad systems." and "Optics of partnering with Google in market;" between "Optics of partnering with Google in market" and "Contracted payments to Google;" and between "Contracted payments to Google" and "From: Henry Erskine Crum" of "February 27, 2018 at 4:33 AM" email	This text contains non-public and confidential information regarding Meta's agreements with a business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad venue unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.

	284	892-12	PALM-006209596-597, between "(where the market is growing)," and "of the $52B publisher ecosystem;" and between "and the monetary investment required for (2)." and "Thanks! -- Henry" of "February 26, 2018 at 23:42" email	This text contains non-public and confidential information regarding Meta's agreements with a business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad venue unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.
	285	892-12	PALM-006209600-613, entire slides	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products, services, or advertising platform that reveal competitively sensitive information, including how users or advertisers use and value Meta's products, services, or advertising platform, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.
**Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 81**			
	286	892-13	PALM-011831167-168 ¶ 6, after "Re-Authorization of Equity Subcommittee Delegation"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.

No. 3:20-cv-08570-JD   -162-   DECL. OF AMRISH ACHARYA ISO OMNIBUS MOT. TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH SUMMARY JUDGMENT AND *DAUBERT* BRIEFING

287	892-13	PALM-011831168-169 ¶ 7, after "Equity Pool Evergreen Increase"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
288	892-13	PALM-011831171 at Exhibit A, after "Approved Expenditures"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
289	892-13	PALM-011831190, row 4 of column 5 (Reed Hastings), below "Netflix"	This text reveals confidential information regarding Netflix's spend on Meta. This text contains confidential, non-public information regarding an advertiser and implicates their confidentiality interests, by revealing the confidential business information of a Meta advertiser who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's advertiser.

DECL. OF AMRISH ACHARYA ISO OMNIBUS MOT. TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH SUMMARY JUDGMENT AND *DAUBERT* BRIEFING

		Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 83	
290	892-13	PALM-016986654-655, between "here's what they want from us," and "Susan" of "February 18, 2015 at 7:04 PM" email	This document describes the negotiation of specific contract terms between Meta and Netflix. This text contains non-public and confidential information regarding Meta's agreements with a non-party developer, advertiser, or business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers, advertisers, or business partners and offer specific deal terms designed to undercut those offered by Meta. This text also contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad targeting and delivery systems. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
291	892-13	Email addresses of Meta employees as highlighted in exhibit	This text reveals email addresses of current or former employees of Meta. These current or former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Meta.

-164-   DECL. OF AMRISH ACHARYA ISO OMNIBUS
                                                                MOT. TO SEAL MATERIALS SUBMITTED IN
                                                                CONNECTION WITH SUMMARY JUDGMENT
                                                                AND *DAUBERT* BRIEFING

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 92			
292	892-13	Entire document	This document describes confidential financial information and data, and sensitive product strategy discussions. This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 93			
293	892-13	Entire document	This document reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.

DECL. OF AMRISH ACHARYA ISO OMNIBUS MOT. TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH SUMMARY JUDGMENT AND *DAUBERT* BRIEFING

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 94			
294	892-13	Entire document	This document describes proprietary market research and analysis on a Meta competitor. This text contains non-public and confidential information regarding Meta's agreements with an advertiser as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an advertiser unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's advertisers and offer specific deal terms designed to undercut those offered by Meta.
Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 95, PX-412 Olivan Deposition			
295	892-13	Email addresses of Meta employees as highlighted in exhibit	This text reveals email addresses of current or former employees of Meta. These current or former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Meta.
296	892-13	PALM-014546138, between "we learned of two key blockers:" and "We believe that the majority of" of "January 30, 2019 at 10:10 PM" email	This text contains non-public and confidential information regarding risks, priorities, and internal strategy relating to advertising on Meta's products, including with respect to specific advertisers or specific types of advertisers. If publicly revealed, this information could cause Meta competitive harm by giving other parties insight into Meta's strategic considerations and thus a competitive advantage over Meta in ongoing or future business negotiations.

297	892-13	PALM-014546139, between "From my side, I think the main issues are:" and "In terms of performance" of "January 30, 2019 at 1:37 PM" email	This text contains non-public and confidential information regarding risks, priorities, and internal strategy relating to advertising on Meta's products, including with respect to specific advertisers or specific types of advertisers. If publicly revealed, this information could cause Meta competitive harm by giving other parties insight into Meta's strategic considerations and thus a competitive advantage over Meta in ongoing or future business negotiations.
Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 96, PX-1926 Sandberg Deposition			
298	892-13	Entire document	This document describes proprietary market research and analysis on a Meta competitor. This text contains non-public and confidential information regarding Meta's agreements with an advertiser as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an advertiser unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's advertisers and offer specific deal terms designed to undercut those offered by Meta.

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 97			
299	892-13	Entire document	This document details confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products, services, or advertising platform that reveal competitively sensitive information, including how users or advertisers use and value Meta's products, services, or advertising platform, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.
Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 99			
300	892-13	Entire document	This document describes potential changes in product functionality. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad targeting and delivery systems. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.

Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 100, PX-119 Parikh Deposition			
301	892-13	Entire document	This document describes technical aspects of Meta's infrastructure. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad targeting and content delivery systems. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 105			
302	892-14	2, between "specific in-app analytics—" and "—that he believed it would be"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
303	892-14	3, image snip between "You should figure out how to do this" and "PALM-016564836"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.

| 304 | 892-14 | 3, image snip between "This is really important" and "/ or let us install a really heavy" | This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

DECL. OF AMRISH ACHARYA ISO OMNIBUS MOT. TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH SUMMARY JUDGMENT AND *DAUBERT* BRIEFING

| 305 | 892-14 | 6, image snip between "specialized tools (like Wireshark)" and "PX 414 at 1" | This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

| 306 | 892-14 | 7, image between "companies' valuable analytics. *Id.*" and "PX 414 at 6" | This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

307	892-14	11, left image snip between "Sending message" and "We used it to measure"	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

DECL. OF AMRISH ACHARYA ISO OMNIBUS MOT. TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH SUMMARY JUDGMENT AND *DAUBERT* BRIEFING

308	892-14	11, right image snip between "video_type (ad or content)" and "PX 1205 at 2-3 (Snapchat); id. at 2 (YouTube)"	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

DECL. OF AMRISH ACHARYA ISO OMNIBUS
MOT. TO SEAL MATERIALS SUBMITTED IN
CONNECTION WITH SUMMARY JUDGMENT
AND *DAUBERT* BRIEFING

| 309 | 892-14 | 11, image between "PX 1205 at 2-3 (Snapchat); id. at 2 (YouTube)" and "PX 1205 at 3" | This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. |

310	892-14	14, image above "Id. at 3"	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.

Defendant Meta Platforms, Inc.'s Reply in Support of Motion to Exclude Expert Testimony and Opinions of Tilman Klumpp, Exhibit 3, Excerpts of Expert Merits Report of Tilman Klumpp, Ph.D., dated Jan. 12, 2024			
311	901-2	77 ¶ 151, between "others at Facebook, writing:" and "In the same e-mail, Ms. Chang advised that;" between "In the same e-mail, Ms. Chang advised that" and "Ms. Chang testified that;" and after "Zuckerberg on April 30, 2014"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
312	901-2	84 ¶ 167 n.360, between "at 266" and "PALM-ADI-0001000836-837"	This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates the nonparty's confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not a party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner.

Defendant Meta Platforms, Inc.'s Reply in Support of Motion to Exclude Expert Testimony and Opinions of Tilman Klumpp, Exhibit 4, Excerpts of Transcript of Deposition of Tilman Klumpp, held on Mar. 5, 2024			
313	901-3	289:7, between "irrational for Facebook to" and "in -- to make that decision"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
Defendant Meta Platforms, Inc.'s Reply in Support of Motion for Summary Judgment Regarding First Amended Consolidated Advertiser Class Action Complaint, Exhibit 12, Excerpts of Expert Merits Report of Michael A. Williams, Ph.D., dated Aug. 5, 2024			
314	903-2	92-93 ¶ 235, image between "OVER TIME IN THE U.S." and "Source: PALM-014824975"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
Defendant Meta Platforms, Inc.'s Reply in Support of Motion for Summary Judgment Regarding First Amended Consolidated Advertiser Class Action Complaint, Exhibit 15, Excerpts of Transcript of Deposition of Tilman Klumpp, held on Mar. 5, 2024			
315	903-5	277:16-18, between "Microsoft agreement that says that" and " Well, there is -- so this"	This text describes specific contract terms between Meta and app developers. This text contains confidential, non-public information regarding a non-party developer. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers.
316	903-5	289:7, between "irrational for Facebook to" and "in -- to make that decision"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.

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2   I declare that the foregoing is true and correct under penalty of perjury.

3   Executed on this ___14___ day of March, 2025, in __Los Altos, CA_____.

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7   By: *Amrish Acharya*   _____

8   Amrish Acharya

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1   **SIGNATURE ATTESTATION**

2   This document is being filed through the Electronic Case Filing (ECF) system by attorney

3   Paul Vanderslice. By his signature, Mr. Vanderslice attests that he has obtained concurrence in the

4   filing of this document from the signatory.

                                                    By: */s/ Paul Vanderslice*
5   Paul Vanderslice

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DECL. OF AMRISH ACHARYA ISO OMNIBUS
                                                            MOT. TO SEAL MATERIALS SUBMITTED IN
                                                            CONNECTION WITH SUMMARY JUDGMENT
                                                            AND *DAUBERT* BRIEFING